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January 24, 2023

**Via ECF**

The Honorable Ronnie Abrams, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Joseph v. Watch Guard 24/7 LLC et al*  
Case No.: 22-cv-05935-RA

Dear Judge Abrams:

This firm represents Plaintiff in the above-referenced matter. We write, jointly with counsel for Defendants, to update the Court on parties' progress towards mediation and request an extension of the stay entered by the Court as parties' class mediation has been rescheduled to January 30, 2023.

While the parties' mediation was previously scheduled on December 19, 2022, parties required this additional time as parties are attempting to engage in a class mediation. Prior to engaging in class mediation parties agreed to engage in an exchange of relevant documentation. Due to administrative difficulties involving documents as well as holiday schedules, parties agreed to reschedule the mediation to January 30, 2023 with Mediator Dina Jansenson.

This is the first request for an extension of the stay in this action. Due to this rescheduling, the parties request the Court adjourn the date by which we will update the Court from December 30, 2022 to February 15, 2023.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF